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MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
OF SOUTHERN CALIFORNIA

SEP 17 1999 0935

September 14, 1999

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

Subject: **Comments Concerning Draft Programmatic EIS/EIR**

Dear Mr. Breitenbach:

Las Virgenes Municipal Water District ("District") is pleased to provide comments on the subject draft programmatic EIR/EIS dated June 1999. Of vital concern to the District and its constituents is the maintenance of supplies of reliable, high quality water to our service area while promoting the environmental enhancement of the Delta.

The District is a member agency of Metropolitan Water District of Southern California (MWD) and we are 100% reliant on imported water to meet our demands. We have no local sources for potable water, surface or groundwater, and must rely on water imported by MWD via the State Water Project from the Delta region. Thus, the issues related to movement of water from the Delta to the south are of grave concern to the District. Our concerns with the new "Preferred Alternative" are similar to those expressed previously and are summarized below:

- **Water Quality** - Inherent in any through-Delta water movement alternative is the high organic loading imposed on the water. This poses significant treatment challenges to the receiving end users to avoid problems with disinfection by-product issues, notably the formation of trihalomethanes. The EIR/EIS does not address any thresholds of quality standards for the exported water, nor any facilities for pre-treatment of the water to improve exported water quality. It appears the CALFED process is primarily a response to environmental issues while ignoring the ever-toughening water quality standards.
- **Facilities** - There is no firm commitment in the EIR/EIS to fund the facility improvements necessary for water supply and quality issues for water exported from the Delta.
- **Operational Considerations** - Pumping operations can be severely curtailed during critical times of the year because of unusually high saline levels or the presence of endangered species in the vicinity of the pumping plants. Shutdown of the pumping operations, especially in times of drought, is extremely deleterious to water users, both urban and agricultural, to the south.



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- **Water Supply Reliability** - Maintaining an adequate flow of water to meet the varied needs of the users to the south is paramount. This can be achieved with various options of storage and water transfers. The EIR/EIS does not address the impacts of delayed decisions to develop new storage or conveyance facilities to meet current and future needs. Another reliability issue is related to the survivability of a through-Delta watercourse to earthquakes. This contingency is not addressed in the EIR/EIS.
- **Balance of Needs** - The EIR/EIS clearly defines environmental standards to maintain fish stocks but does not establish or quantify the same standards for urban and agricultural users. There is no clear balance of equity between urban, farm, and environmental users.
- **Commitment to Water Conservation** - Enhancements to water use efficiency and utilization of conservation methods form the basis for effective use of imported water. In the EIR/EIS, CALFED makes no commitment or assurance of funding of further conservation programs to reduce overall demands and impacts on the Delta resources.

One further major concern held by the District with the "Preferred Alternative" relates to the more general issue of inadequate discussion in the EIR/EIS of the impacts of not providing sufficient supply of high quality water to Southern California. Simply put, there is no analysis of the impacts on Southern California if water supplies are severely curtailed or eliminated because of other considerations in the Delta region.

Even though the state has experienced five years of "wet" conditions, storage reserves have been reduced to meet federal regulatory restrictions. The CALFED Program as currently proposed offers no assurance that water needs can be met in times of drought or other constraints. There currently is no mechanism in the proposed CALFED alternative for the overall water supply system to replenish itself because of the needs dictated in the Delta. All needs and requirements (urban, agricultural, and environmental) must be balanced in an equitable manner to ensure the livelihood of the users to the south. It is imperative that there are no further losses of water supply compared with current available supplies in the Delta. Impacts of this failure to provide for the needs of the State Water Project users to the south must be addressed.

Urban water interests in Southern California must be assured of a reliable dry year supply from the State Water Project (from the Delta, other storage, or the like). Concurrently, in the wet years, full use of the State Water Project to move water to the south must be maintained to replenish local storage reservoirs (above and below ground). Out-of-Delta solutions such as enhanced treatment facilities and alternative water supply sources are not addressed relative to meeting the needs of the Southern California users. Again, the EIR/EIS does not address the impacts on Southern California users if these methods are not adopted as a part of the overall program.

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Technical performance standards for all Delta conveyance alternatives are not disclosed in the EIR/EIS. Without the standards, it is difficult to assess whether or not objectives of the CALFED objectives for overall supply reliability, operational reliability goals, ecosystem enhancement, and water quality are being met. This matter must be addressed in the EIR/EIS.

The importance of a CALFED solution is paramount and of utmost concern to all water users in the state. Full disclosure in the EIR/EIS of the impacts of implementing, or not implementing, various alternatives in the Delta must be made to ensure all interests are represented fairly. Southern California interests in the solutions must be maintained and not overlooked. The implications of curtailed water service to users like Las Virgenes are unthinkable. We simply cannot provide water service to our constituents without it. This impact must be addressed in the EIR/EIS to fully understand the implications of the final course of action.

Sincerely;

A handwritten signature in cursive script that reads "Gordon L. Knopp". The signature is written in dark ink and is positioned above the printed name and title.

Gordon L. Knopp
President

GLK:CET:alw